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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JOHN W.
MCCAULEY IN SUPPORT OF
PLAINTIFF WAYMO LLC'S MOTION
FOR CONTINUANCE OF TRIAL DATE**

1 I, John McCauley, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of the Summary Report prepared
7 by Stroz Friedberg dated August 5, 2016 ("Stroz Report"), produced with bates number .

8 3. Attached as Exhibit 2 is a true and correct copy of Exhibit 17 to the Stroz Report,
9 produced by Uber at bates number UBER00312645.

10 4. Exhibit 3 was intentionally omitted.

11 5. Attached as Exhibit 4 is a true and correct copy of a true and correct copy of
12 Exhibit 22 to the Stroz Report, produced by Uber at bates number UBER00312677.

13 6. Attached as Exhibit 5 is a true and correct copy of an email exchange, produced by
14 Uber at bates number UBER00313699.

15 7. Attached as Exhibit 6 is a true and correct copy of an email exchange, produced by
16 Uber at bates number UBER00314130 .

17 8. Attached as Exhibit 7 is a true and correct copy of excerpts from the July 27, 2017
18 deposition transcript of Travis Kalanick.

19 9. Attached as Exhibit 8 is a true and correct copy of excerpts from the June 19, 2017
20 deposition transcript of Cameron Poetzcher.

21 10. Attached as Exhibit 9 is a true and correct copy of excerpts from the April 14, 2017
22 deposition transcript of Rhian Morgan.

23 11. Exhibit 10 was intentionally omitted.

24 12. Attached as Exhibit 11 is a true and correct copy of an email from counsel for Uber
25 to counsel for Waymo dated Sept, 15, 2017.

26 13. Attached as Exhibit 12 is a true and correct copy of an email exchange between
27 counsel for Uber and counsel for Waymo dated Sept, 14, 2017.

28

1 14. Attached as Exhibit 13 is a true and correct copy of privacy screening terms
2 provided by counsel for Anthony Levandowski.

3 15. Attached as Exhibit 14 is a true and correct copy of Exhibit 27 to the Stroz Report,
4 produced originally in native form by Uber at bates number UBER00312709.

5 16. Attached as Exhibit 15 is a true and correct copy of Exhibit 42 to the Stroz Report,
6 produced by Uber at bates number UBER00313106.

7 17. Attached as Exhibit 16 is a true and correct copy of a document produced following
8 the September 14, 2017 inspection of the Stroz materials located at Morrison Forester, produced
9 by Uber at bates number SFM00000015.

10 18. Attached as Exhibit 17 is a true and correct copy of a document produced following
11 the September 14, 2017 inspection of the Stroz materials located at Morrison Forester, produced
12 by Uber at bates number SFM00000022.

13 19. Attached as Exhibit 18 is a true and correct copy of a document produced following
14 the September 14, 2017 inspection of the Stroz materials located at Morrison Forester, produced
15 by Uber at bates number SFM00000039.

16
17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19 DATED: September 16, 2017

20 /s/ John W. McCauley
 John W. McCauley

21
22
23 **SIGNATURE ATTESTATION**

24 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
25 filing of this document has been obtained from John McCauley.

26
27 /s/ Charles K. Verhoeven
 Charles K. Verhoeven